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July 3, 2012

Magistrate Judge Michael A. Hammer  
Martin Luther King, Jr. Federal Building & U.S. Courthouse  
Court Room MLK 3C  
50 Walnut Street  
Newark, New Jersey 07101

Re: Virtual Studios, Inc. v. Couristan, Inc.  
Civil Action No. 11-cv-00427-JLL-MAH  
Our File No. RQ13285

Dear Magistrate Hammer:

In accordance with your order of June 27, 2012, counsel for both parties met and conferred concerning the matters addressed in their letters of June 20 and June 21 to Your Honor (ECF Nos. 54 and 55). This joint letter is intended to inform Your Honor of the results of our conference.

We have amicably resolved most of the issues raised in our correspondence to the Court. Our proposed resolution is set forth in a stipulation submitted herewith which we respectfully request that Your Honor enter as "So Ordered."

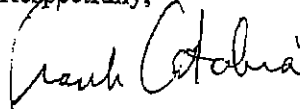
As Your Honor recalls, the dispute centered upon 8 additional interrogatories which plaintiff served on defendant, exceeding the number allowed under the Court's original scheduling order.

Pursuant to agreement between both counsel, defendant is willing to answer the first 7 interrogatories by July 13, 2012, on condition that plaintiff agree that defendant can reserve the right to serve an additional 8 interrogatories of its own should it deem it necessary, so long as plaintiff would have a reasonable opportunity to respond.

The problem with the 8th interrogatory is more substantial in that defendant's objections thereto go to the substance and, defendant believes, require full briefing and argument development. Accordingly, if the Court approves, plaintiff has agreed to file a motion to compel, to which defendant would have an opportunity to fully respond, and the parties have tentatively agreed on a briefing schedule. If the Court approves, plaintiff would file its motion by July 20, defendant would respond by August 1, and plaintiff's reply would be due by August 8. If the Court is willing to permit letters rather than a formal motion or suggests an alternative to resolving the issue, we shall be guided accordingly.

Thank you for your assistance in this regard.

Respectfully,

A handwritten signature in black ink, appearing to read "Frank Catalina", written in a cursive style.

Frank E. Catalina

FEC:mf

cc: Robert Weisbein, Esq.  
Britton Payne, Esq.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

VIRTUAL STUDIOS, INC.

Plaintiff,

v.

COURISTAN, INC.

Defendant.

CIV. ACTION No. 11-00427-JLL-CCC


**STIPULATION AND ORDER**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the parties, that the parties' dispute over the Second Set of Interrogatories of Plaintiff Virtual Studios, Inc. to Defendant Couristan, Inc. be resolved on the following terms:

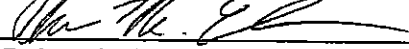
1. Upon the Court so-ordering this stipulation, Couristan shall respond to Virtual's Interrogatories No. 1-7 by July 13, 2012;
2. The number of interrogatories each party is allowed shall be expanded to 32, leaving Couristan with 16 remaining interrogatories and Virtual with none; and
3. Virtual shall file a motion to compel with respect to its Interrogatory No. 8, to which Couristan objects, on the following briefing schedule:
  - a. Virtual shall file its motion to compel by 5:00 p.m. on July 20, 2012;
  - b. Couristan shall file its opposition by 5:00 p.m. on August 1, 2012; and

c. Virtual shall file its reply by 5:00 p.m. on August 8, 2012.

**MARGULIES WIND, PA**

By:  /s/ Robert E. Margulies.  
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Attorneys for Defendant Couristan, Inc.

SO ORDERED.

Date:

Hon. Magistrate Judge Michael Hammer